

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN
COMMUNITY SUPPORT; LEAGUE OF
UNITED LATIN AMERICAN CITIZENS;
and MAKE THE ROAD NEW YORK,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 1:25-cv-00038-JL-TSM

**ASSENTED-TO MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF
ELIZABETH CALDWELL AS COUNSEL FOR PLAINTIFFS**

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, Indonesian Community Support, Legal of United Latin American Citizens, and Make the Road New York (“Plaintiffs”) respectfully move this court for an order admitting Ms. Elizabeth Caldwell to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Ms. Caldwell is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Ms. Caldwell to appear before this Court.

2. Ms. Caldwell is a member in good standing of the bars of New York State, the United States District Court for the Southern District of New York, and the United States Court of Appeals for the Tenth Circuit; she is not suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and she has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this

motion and enter an order for admission of Ms. Caldwell *pro hac vice* in the above-captioned case.

4. Defendants assent to the relief requested in this Motion.

5. **Certificate of Concurrence:** Pursuant to Local Rule 7.1(c), undersigned counsel for Plaintiffs certify that Plaintiffs have made a good faith attempt to obtain concurrence in the relief sought. Plaintiffs sought concurrence on January 22, 2025 and had not yet obtained assent by the time of filing on the same date.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

A. Grant this Motion for Admission *Pro Hac Vice* of; and

B. Grant such other and further relief as may be just and equitable.

Date: January 22, 2025

Respectfully submitted,

/s/ Gilles Bissonnette

SangYeob Kim (N.H. Bar No. 266657)

Gilles R. Bissonnette (N.H. Bar No. 265393)

Henry R. Klementowicz (N.H. Bar. No. 21177)

Chelsea Eddy (N.H. Bar No. 276248)

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Counsel for Plaintiffs

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AFFIDAVIT OF ELIZABETH CALDWELL

I, Elizabeth Caldwell, do hereby depose and swear as follows:

1. In accordance with Local Rule 83.2(b)(1)(A), I am an attorney at the NAACP Legal Defense & Educational Fund, Inc. My office address is 40 Rector Street, Fifth Floor, New York, NY 10006. My email address is bcaldwell@naacpldf.org, and my telephone number is (212) 965-2200.

2. In accordance with LR 83.2(b)(1)(B), the following are the courts in which I am admitted to practice, along with the years and dates of my admission:

- a. New York State Bar, admitted since March 27, 2019;
- b. Southern District of New York, admitted since February 21, 2023;
- c. United States Court of Appeals for the Tenth Circuit, admitted since November 22, 2024.

3. In accordance with LR 83.2(b)(1)(C), I am a member in good standing and eligible to practice in the above-listed courts.

4. In accordance with LR 83.2(b)(1)(D), I am not currently and have never been suspended or disbarred in any jurisdiction.

5. In accordance with LR 83.2(b)(1)(E)(1), I have not been denied admission to practice before any court.

6. In accordance with LR 83.2(b)(1)(E)(2), I have not previously been disciplined by any court, nor am I subject to any pending disciplinary matters.

7. In accordance with LR 83.2(b)(1)(E)(3), I have not been convicted of any felony or misdemeanor crimes.

8. In accordance with LR 83.2(b)(1)(F), I have not been denied admission to practice before any court, and no court has denied or revoked my pro hac vice status.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: January 22, 2025

Respectfully submitted,

/s/ Elizabeth Caldwell

Elizabeth Caldwell

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